

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
V.	)	Criminal No. 04-16E
	)	
BAMBINA DOMODOSSOLA	)	

**MOTION FOR APPOINTMENT OF COUNSEL**

AND NOW comes undersigned counsel, Linda E. J. Cohn, Assistant Federal Public Defender, and respectfully moves this Honorable Court, on defendant Bambina Domodossola's behalf, for appointment of counsel. In support thereof counsel states:

1. Bambina Domodossola was sentenced by this Court on August 16, 2004, while represented by Attorney David Ridge.
2. Attorney Ridge subsequently filed a Motion to Withdraw as Counsel, which was granted by this Court on August 24, 2004.
3. Following the filing of a Notice of Appeal, the Third Circuit appointed the Office of the Federal Public Defender, Western District of Pennsylvania, as counsel for Ms. Domodossola.

4. The Third Circuit granted Ms. Domodossola's unopposed Motion for Summary Remand, and issued the mandate on August 11, 2005.

5. The Office of the Federal Public Defender has continuously represented Ms. Domodossola in the Third Circuit, and would like to represent Ms. Domodossola at her re-sentencing in the district court.

WHEREFORE, the Office of the Federal Public Defender seeks the appointment of counsel by this court to represent Ms. Domodossola for her re-sentencing proceedings.

Respectfully submitted,

S/Linda Cohn

Linda E.J. Cohn

Assistant Federal Public Defender